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11
12 **UNITED STATES BANKRUPTCY COURT**
13 **DISTRICT OF ARIZONA**
14

15 In re:

16 POTENTIAL DYNAMIX, LLC,

17 Debtor.

Case No. 2:11-bk-28944-DPC

CHAPTER 11

Adv. No. 2:13-ap-00799

18 TIMOTHY H. SHAFFER, Chapter 11 Trustee,

19 Plaintiff,

20 vs.

21 AMAZON SERVICES LLC,

22 Defendant.

**PLAINTIFF'S DISCLOSURE OF EXPERT
WITNESS PURSUANT TO FED. R. CIV. P.
26(a)(2)**

23 Pursuant to Fed. R. Civ. P. 26(a)(2), made applicable in these proceedings by Fed. R. Bankr. P.
24 7026, Plaintiff Timothy H. Shaffer, Chapter 11 Trustee (the "**Trustee**") for Debtor Potential Dynamix,
25 LLC ("**Debtor**"), hereby submits his expert witness disclosures and areas of expert testimony as
follows:

1. Stephen A. Ashworth
Ashworth Consulting, LLC
3246 S Cottonwood Drive
Chandler, Arizona 85286
Phone: (480) 270-8343
E-mail: sashworth@ashconllc.com

1 The Trustee anticipates Mr. Ashworth will provide testimony regarding the Trustee's inventory
2 claims in this proceeding, including: (a) Amazon Services LLC's ("**Amazon**") overall liability to the
3 Debtor's estate and the extent of all related damages and (b) Amazon's failure to specifically and
4 accurately account for all of the Debtor's inventory units and the resulting damages. Mr. Ashworth may
5 also rebut any affirmative testimony proffered by Amazon as to its alleged defenses to the inventory
6 claims and total liabilities, including the proper calculation of and total amount of Amazon's liabilities
7 to the Debtor, including offsets and alleged reimbursements.

8 2. Cathie Cameron
9 Ness Consulting, LLC
10 261 East Vinedo Lane
11 Tempe, Arizona 85284
12 Phone: (480) 247-9099
13 E-mail: ccameron@nessexpert.com

14 The Trustee anticipates Ms. Cameron will provide testimony regarding the generally accepted
15 industry standards for inventory accounting.

16 3. Sonoran Capital Advisors
17 Phoenix, Arizona
18 Phone: (602) 405-5380
19 E-mail: mfoster@sonorancap.com
20 bperkinson@sonorancap.com

21 The Trustee anticipates Sonoran Capital Advisors will provide testimony regarding the Trustee's
22 stay violation claims and resulting compensatory and consequential damages including loss of revenue,
23 profits, business opportunities, and goodwill. Sonoran Capital Advisors may also rebut any affirmative
24 testimony proffered by Amazon as to its alleged defenses to the Trustee's stay violation claims and
25 calculation of resulting damages.

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1 DATED this 14th day of April, 2017.

2 SCHIAN WALKER, P.L.C.

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4 By /s/ NATHAN T. MITCHLER, #028751

5 Dale C. Schian
6 Scott R. Goldberg
7 Nathan T. Mitchler
8 Attorneys for the Chapter 11 Trustee

9 COPY of the foregoing
10 e-mailed this 14th day
11 of April, 2017, to:

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26 /s/ DEBBI STEPHENS